

CLERK'S OFFICE U.S. DISTRICT COURT  
AT LYNCHBURG, VA  
FILED  
IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Lynchburg DIVISION

SEP 08 2023

LAURA A. AUSTIN, CLERK  
BY: C. Austin  
DEPUTY CLERK

Rachel Peters \_\_\_\_\_ )  
\_\_\_\_\_, \_\_\_\_\_ )  
\_\_\_\_\_, \_\_\_\_\_ )  
Plaintiff(s), \_\_\_\_\_ )  
\_\_\_\_\_, \_\_\_\_\_ )  
v. \_\_\_\_\_ ) Civil Action No.: 6:23-cv-00044-NKM  
JP Morgan Chase & Co. \_\_\_\_\_ ) (To be assigned by Clerk of District Court)  
\_\_\_\_\_, \_\_\_\_\_ )  
Defendant(s). \_\_\_\_\_ )  
(Enter the full name(s) of ALL parties in this lawsuit. )  
Please attach additional sheets if necessary. )

COMPLAINT

PARTIES

1. List all Plaintiffs. State the full name of the Plaintiff, address and telephone number.  
Do the same for any additional Plaintiffs.

a. Plaintiff No. 1

Name: Rachel Peters  
Address: 189 Lynview Drive, Lynchburg, VA 24502  
Telephone Number: 434-386-7588

b. Plaintiff No. 2

Name: \_\_\_\_\_  
Address: \_\_\_\_\_  
Telephone Number: \_\_\_\_\_

2. List all Defendants. State the full name of the Defendant, even if that Defendant is a government agency, an organization, a corporation, or an individual. Include the address where each Defendant may be served. Make sure that the Defendant(s) listed below are identical to those contained in the above caption of the complaint.

a. Defendant No. 1

Name: JP Morgan Chase & Co.

Address: Patrick Alan Harvey at Morgan Lewis Law

b. Defendant No. 2

Name: \_\_\_\_\_

Address: \_\_\_\_\_

**NOTE: IF THERE ARE ADDITIONAL PLAINTIFFS OR DEFENDANTS, PLEASE PROVIDE THEIR NAMES AND ADDRESSES ON A SEPARATE SHEET OF PAPER.**

Check here if additional sheets of paper are attached:

Please label the attached sheets of paper to correspond to the appropriate numbered paragraph above (e.g. Additional Defendants 2.c., 2.d., etc.).

#### JURISDICTION

Federal courts are courts of limited jurisdiction. Generally, two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount of damages is more than \$75,000 is a diversity of citizenship case. Federal courts also have jurisdiction over cases where the United States is a Defendant.

3. What is the basis for federal court jurisdiction?

Federal Question       Diversity of Citizenship       Government Defendant

4. If the basis for jurisdiction is Federal Question, which Federal Constitution, statutory or treaty right is at issue? List all that apply.

This is an amended complaint that the account is being reported inaccurately and JP Morgan Chase & Co. has been negligent and noncompliant with the requirements imposed upon the Fair Credit Reporting Act.

5. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party? Each Plaintiff must be diverse from each Defendant for diversity jurisdiction.

Plaintiff No. 1: \_\_\_\_\_ State of Citizenship: \_\_\_\_\_

Plaintiff No. 2: \_\_\_\_\_ State of Citizenship: \_\_\_\_\_

Defendant No. 1: \_\_\_\_\_ State of Citizenship: \_\_\_\_\_

Defendant No. 2: \_\_\_\_\_ State of Citizenship: \_\_\_\_\_

**Attach additional sheets of paper as necessary and label this information as paragraph 5. Check here if additional sheets of paper are attached.**

#### STATEMENT OF THE CLAIM

Describe in the space provided below the basic facts of your claim. The description of facts should include a specific explanation of how, where, and when each of the defendants named in the caption violated the law, and how you were harmed. Do not give any legal arguments or cite cases or statutes. Each paragraph must be numbered separately, beginning with number 6. Please write each single set of circumstances in a separately numbered paragraph.

6. In the summer of 2019 my wallet went missing. I didn't think anything of it, assuming it would show back up. I recently tried to apply for a credit card and a home loan and was denied due to my credit report. I reviewed my credit report November of 2022 and noticed inaccurate accounts on my report. I notified the three main credit bureaus and went through the disputing process with the credit card companies. JP Morgan Chase & Co. did not remove the account I was claiming as fraudulent. Therefore I am taking them to court for negligence, non-compliance with the Fair Credit Reporting Act and for all the inaccuracies on my credit report due to this account reporting inaccurately, as well for the distress I have suffered in the process.

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Attach additional sheets of paper as necessary and label them as Additional Facts and continue to number the paragraphs consecutively. Check here if additional sheets of paper are attached.

## REQUEST FOR RELIEF

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking.

I am seeking an opportunity to have my case heard and to be compensated by JP Morgan Chase & Co. in the amount of \$20000 as well as to have these accounts deleted.

DEMAND FOR JURY TRIAL:

YES

NO

Signed this 28 day of Aug, 2023

Signature of Plaintiff No. 1



Signature of Plaintiff No. 2

**NOTE: All Plaintiffs named in the caption of the complaint must date and sign the complaint.  
Attach additional sheets of paper as necessary.**